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*ADMITTED TO PRACTICE IN NEW YORK, CONNECTICUT, AND WASHINGTON, D.C.

July 28, 2025

Honorable Jesse M. Furman
United States District Judge
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: Diamond Tucker St. Property, LLC v. Watson, et al; 1:25-cv-01746 (JMF)

Dear Judge Furman:

I represent the Plaintiff, Diamond Tucker St. Property, LLC (“DTS”), with respect to the above matter. As the Court may be aware, at the proverbial Eleventh Hour, on Friday, July 25, 2025 at 3:59 p.m., the Defendants, Felcia B. Watson, Esq., and The Law Offices of Felicia B. Watson, PLLC, through Counsel, filed a Motion to Dismiss with a return date of August 8, 2025. The new Motion asserts, *inter alia*, that notwithstanding the fact that Attorney Watson is a New York licensed attorney in good standing with the Appellate Division, Second Department, which is a Court geographically embracing the jurisdiction of the Southern District of New York, implausibly, this Court lacks personal jurisdiction over her. In sum and substance, the new Motion filed at 3:59 p.m. on Friday sets forth a meritless argument.

Plaintiff maintains that the new Motion is procedurally deficient by virtue of Defendants having failed to move, under Fed. R. Civ. P. 55(c), to set aside the existing default either prior to, or contemporaneous with, their filing of the new Motion at the last minute on Friday. Nevertheless, by this letter Motion, Plaintiff respectfully requests that the Court vacate the Court’s Order dated July 9, 2025 directing the Plaintiff to file a Motion for Default Judgment on or before July 28, 2025 (ECF No. 19).

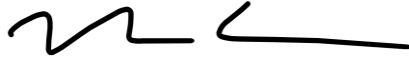
There is good cause for the granting of this letter Motion and the relief it requests. First and foremost, vacating the Order promotes Judicial economy given Defendants’ new Motion.

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Second, if the Plaintiff were to proceed to finalize the preparation of its default Judgment given this recent development, it would result in a dissipation of resources, an irreparable prejudice to the Plaintiff, and be an exercise in futility because it would most likely be denied by the Court, after the aforementioned expenditure of resources, both financial and otherwise. For all the above reasons, the Plaintiff respectfully requests that the Court vacate its July 9, 2025 Order (ECF No. 19).

The Court's time and kind attention to this request is appreciated.

Very Truly Yours,



Roderick D. Woods, Esq.

cc: Diamond Tucker St. Property, LLC
All Counsel of Record via ECF

Application GRANTED (although the Clerk of Court need not strike ECF No. 19 from the docket). The Clerk of Court is directed to terminate ECF No. 25.

SO ORDERED.



July 28, 2025